

Clifford Tucker

From: Clifford Tucker
Sent: Thursday, January 23, 2020 10:41 AM
To: 'dkkimlaw@gmail.com'
Cc: paralegal 10
Subject: NOTICE OF DEFAULT - Armando Sapon Sapon et al v. Hanbat Restaurant, Inc. et al (1:18-cv-11457-SLC)
Attachments: 20.01.22-HB-FR PL-Default Letter-TO DE D2.pdf; Defendants Executed Agreement and Confessions.pdf

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Kim,

Please allow this email to serve as formal notice of default of Defendants in making payments pursuant to the settlement agreement in the above-named action. Please instruct your clients to promptly cure the default by providing three checks in the amount of Eleven Thousand Six Hundred Sixty Six and Sixty Seven/100 dollars (\$11,666.67) made payable to "Michael Faillace and Associates, P.C." for immediate deposit. The payment shall be made by sending the check via USPS, UPS, or Fedex with a tracking number to "Michael Faillace and Associates, P.C." at 60 E. 42nd Street, Suite 4510, New York, New York 10165.

As set out in the settlement agreement, if your client fails to cure the default, we will be entitled to enter the Confessions of Judgment in the Supreme Court of the State of New York, New York County against Defendants and all property, of any kind, in which Defendant Nack Gyeun Mun has any ownership interest.

Please call us with any questions or concerns as they may arise.

Thank you for your time and attention to this matter.

Sincerely,

Clifford R. Tucker, Esq.
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New York, NY 10165
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January 22, 2020

BY FIRST CLASS MAIL AND EMAIL

Do Kyung Kim
Do Kyung Kim & Associates
5 West 32nd Street
Ground Flr.
New York, NY 10001
Email: dkkimlaw@gmail.com

Re: Armando Sapon Sapon et al v. Hanbat Restaurant, Inc. et al
CASE #: 1:18-cv-11457-SLC

Dear Mr. Kyung Kim,

This letter shall serve as notice pursuant to Paragraph 1 of the settlement agreement in this action that Defendants have defaulted by failing to make the first, second and third installment payment due and owing as of October 1, 2019, November 1, 2019 and December 1, 2019.

Please instruct your clients to promptly cure the default by providing three checks in the amount of Eleven Thousand Six Hundred Sixty Six and Sixty Seven/100 dollars (\$11,666.67) made payable to "Michael Faillace and Associates, P.C." for immediate deposit. The payment shall be made by sending the check via USPS, UPS, or Fedex with a tracking number to "Michael Faillace and Associates, P.C." at 60 E. 42nd Street, Suite 4510, New York, New York 10165.

As set out in the settlement agreement, if your client fails to cure the default, we will be entitled to enter the Confessions of Judgment in the Supreme Court of the State of New York, New York County against Defendants and all property, of any kind, in which Defendant Nack Gyeun Mun has any ownership interest.

Thank you for your prompt attention to this matter.

Very truly yours,

/s/ Clifford R. Tucker

Clifford R. Tucker, Esq.